

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION**

PATRICIA STONE	§	
Plaintiff	§	
VS.	§	NO: 6:19-CV-00061-H
	§	
TOM GREEN COUNTY, Texas,	§	
ALLISON PALMER, in her Official	§	
Capacity, and JOHN BEST, in his	§	
Official capacity,	§	
Defendants	§	

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**

TO THE HONORABLE JUDGE PRESIDING:

COME NOW DEFENDANTS Tom Green County, Allison Palmer, in her official capacity, and John Best, in his official capacity (collectively "Defendants"), and, pursuant to the Court's February 13, 2020 Order, file this Response to the Motion for Partial Summary Judgment filed by Plaintiff Patricia Stone ("Plaintiff"). Defendants respectfully request that the Court deny the motion because Plaintiff cannot support one or more of the essential elements of her claim, and facts and case law cited in her brief do not support her claims for relief. Pursuant to local rule 56.4(b), each of the required matters of Rule 56.4(a) will be set forth in Defendant's brief.

WHEREFORE, PREMISES CONSIDERED, Defendants respectfully request that the Court dismiss Plaintiff's claims in their entirety, and accordingly, deny Plaintiff's motion for summary judgment. Defendants request that the Court grant their motion for summary judgment, award Defendants their costs, along with such other and further relief, in law and in equity, both general and specific, to which Defendants may show themselves to be justly entitled.

Respectfully Submitted,

By: /s/ R. Layne Rouse

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document is being served on this 19th day of March, 2020 to the Plaintiff in accordance with the Federal Rules of Civil Procedure.

/s/ R. Layne Rouse

R. Layne Rouse